

REMARKS

This application has been carefully reviewed in light of the Advisory Action dated January 10, 2006. Claims 1 to 45 are in the application, of which Claims 1 and 40 are the only independent claims. Reconsideration and further examination are respectfully requested.

The Advisory Action provided a rationale for maintaining the current rejection over Greenstein in view of Burgess, and further provided a counterargument to Applicant's argument that Greenstein is unrelated to network communications. According to the Advisory Action, a broad interpretation was given to the word "network":

"Based on broadest reasonable interpretation, a network can be interpreted as one or more components, devices, computers, operator, etc., communicating and/or connected with each other ..."

Applicant agrees that this interpretation of the word "network" is broad, but does not agree that it is reasonable. Reasonableness is determined by reference to language of the claims, the specification, and the prior art, and an understanding how those of ordinary skill in the art would interpret the claim language in view of the specification and the prior art. As so-understood, it is clear that Applicant's invention pertains to multifunction network devices that communicate with each other on a network, with each multifunction network device communicating with the network via some sort of network interface. However, and as Applicant understands the rejection, it equates individual ones of components inside Greenstein's device with the claimed plurality of multifunction network devices, and

equates communication on a network with Greenstein's single-bus communication between his components. Such an interpretation is not "reasonable" in view of the language of the claims, the specification and the prior art, and in view of the manner in which one of ordinary skill in the art would interpret them.

Nevertheless, the claims have been amended so as to specify that each multifunction network device includes a network interface for communication on the network. Such an amendment is believed to constrain the interpretation of the word "network" to its proper and reasonably broad meaning.

The Advisory Action further stated that "a network device can be interpreted as a device designed for use on a network", with the implication being that even though Greenstein does not mention the suitability for his system on a network, it might nevertheless have been "designed for use on a network". In response, Applicant respectfully asserts that there is no way of knowing whether Greenstein's system was "designed for use on a network", since Greenstein's disclosure does not mention it. Accordingly, any such argument is based on pure speculation without basis in the cited prior art. Moreover, even if it were true that Greenstein's system is "designed for use on a network" (which is not conceded), the rejection must still be withdrawn. Specifically, the rejection is premised on an interpretation of Greenstein whereby individual ones of the components within his system correspond to the claimed plurality of network devices. The rejection is not premised on an interpretation whereby Greenstein's entire system corresponds to one of the claimed multifunction network devices. Accordingly, even if there is speculation as to whether Greenstein's overall system is or is not "designed for use

on a network”, such speculation does not fit the interpretation used in rejecting the claims, which focuses on individual components within Greenstein’s system and not on Greenstein’s overall system.

In view of the foregoing, Applicant reiterates his position that the Greenstein system is unrelated to network communication, and further that it is not logical to conclude that Burgess and Greenstein are “from the same field of endeavor”, such that any combination of the two would not have commended itself to those of ordinary skill in the art. Withdrawal of the rejections over Greenstein in view of Burgess are respectfully requested.

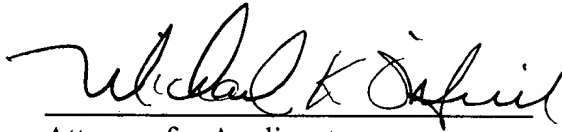
REQUEST FOR INTERVIEW

It is regrettable that an interview was not conducted before issuance of the Advisory Action. It is therefore respectfully requested for the Examiner to telephone the undersigned when this case next comes up for action, and before a next communication is issued from the USPTO.

CONCLUSION

Applicant's undersigned attorney may be reached in our Costa Mesa, California office at (714) 540-8700. All correspondence should continue to be directed to our below-listed address.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michael K. O'Neill", is written over a horizontal line.

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